

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Rel. Dkt. Nos. 526, 530

**CERTIFICATION OF COUNSEL REGARDING ORDER AUTHORIZING THE
EMPLOYMENT OF KELLEY DRYE & WARREN LLP
AS LEAD COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS EFFECTIVE AS OF JANUARY 30, 2025**

The undersigned hereby certifies that, on February 28, 2025, the Official Committee of Unsecured Creditors (the “Committee”) filed the *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment of Kelley Drye & Warren LLP as Lead Counsel Effective as of January 30, 2025* (the “Application”) [Docket Nos. 526 and 530, respectively] .

1. The Application is currently scheduled for hearing on April 3, 2025 at 1:00 p.m. (ET) before the Honorable Craig T. Goldblatt. The deadline for objections to the Application were to be filed by March 14, 2025 at 4:00 p.m. (ET) (the “Objection Deadline”).

2. Prior to the Objection Deadline, Kelley Drye & Warren LLP (“Kelley Drye”) received informal comments from the Office of the United States Trustee.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. Attached hereto as **Exhibit A** is the revised proposed Order (the “Order”) for entry by the Court.

4. Attached hereto as **Exhibit B** is a redline of the Order against the proposed order filed with the Application.

5. Accordingly, it is hereby respectfully requested that the proposed order attached hereto as **Exhibit A** be entered at the Court’s earliest convenience.

Dated: March 17, 2025

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ James E. O’Neill

Bradford J. Sandler (DE Bar No. 4142)

James E. O’Neill (DE Bar No. 4042)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19801

Telephone: (302) 652-4100

Facsimile: (302) 652-4400

Email: bsandler@pszjlaw.com

joneill@pszjlaw.com

- and -

KELLEY DRYE & WARREN LLP

Jason R. Adams (admitted *pro hac vice*)

Eric R. Wilson (admitted *pro hac vice*)

Maeghan J. McLoughlin (admitted *pro hac vice*)

3 World Trade Center

175 Greenwich Street

New York, NY 10007

Tel.: (212) 808-7800

Email: jadams@kelleydrye.com

ewilson@kelleydrye.com

mmcloughlin@kelleydrye.com

*Proposed Co-Counsel to the Official Committee
of Unsecured Creditors*